

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

)	
VALERIE GILLEN)	
)	
Plaintiff,)	
)	
v.)	04-CV-12517-GAO
)	
CNA GROUP LIFE ASSURANCE)	
COMPANY)	
)	
Defendant.)	
)	

MOTION TO EXTEND TIME TO FILE RESPONSIVE PLEADING

Defendant CNA Group Life Assurance Company (“CNA”) hereby moves this Court to extend the date by which CNA is required to respond to Plaintiff’s Complaint to and including January 14, 2005. Plaintiff served the Complaint in this case upon the Massachusetts Insurance Commissioner pursuant to M.G.L. c. 175 § 154, establishing December 27, 2004 as the date CNA's responsive pleading is due. Due to the alternative method of service established in M.G.L. c. 175 § 154, CNA did not receive the Complaint from the Insurance Commissioner until December 14, 2004. CNA is currently in the process of gathering the documents necessary to respond to the Complaint; however, due to the delayed receipt of the Complaint and the upcoming holidays, CNA requires additional time to appropriately respond to Plaintiff’s Complaint. CNA's counsel and Plaintiff’s counsel discussed these issues on December 20, 2004 and Plaintiff’s counsel assented to this Motion to Extend CNA's time to file a responsive pleading to and including January 14, 2005.

Respectfully Submitted,
Defendant CNA Group Life Assurance Company
By its Counsel:

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Assented to by,
Plaintiff Valerie Gillen,
By her counsel:

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served on Plaintiff's counsel by first class U.S. Mail, postage prepaid this 20th day of December, 2004.

S/Katherine R. Parsons
Katherine R. Parsons